

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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HILDA R. MUINOS,	:
	:
Plaintiff,	: ECF CASE
	:
v.	: CASE NUMBER: 08 CV 0271
	:
THOMAS NELSON, INC.,	: (G.B.D.)
	:
Defendant.	:

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**DECLARATION OF VIVIAN DOLE-MERSON
IN OPPOSITION TO MOTION OF DEFENDANT
THOMAS NELSON, INC. TO TRANSFER VENUE**

I, Vivian Dole-Merson, declare and state as follows:

1. I am a very close personal friend of plaintiff Hilda R. Muinos ("Hilda" or "Ms. Muinos"). I make this Declaration in opposition to Defendant's motion to transfer this action to the Middle District of Tennessee. Except for the facts stated on information and belief, all of the facts set forth herein are known to me personally, and if called as a witness, I would testify competently to them.

2. I have known Ms. Muinos for over fifteen years.

3. Whenever Ms. Muinos travels to New York, I always meet her at the airport when she arrives and I drive her to the airport when she departs.

4. Whenever Ms. Muinos stays in New York, she stays with my mother, Guadalupe Dole or in the alternative she stays with me at my home located in Westchester County, New York.

5. For these reasons, I respectfully request that the Court deny Defendant's motion to transfer this case to the Middle District of Tennessee.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
Executed on March 14, 2008 at New York, New York.

Respectfully submitted,

By: 
Vivian Dole-Merson